

TIMOTHY ELDER (CA BAR NO. 277152)
KRISTOPHER A. NELSON (CA BAR NO. 342552)
TRE LEGAL PRACTICE
1155 Market Street, Tenth Floor
San Francisco, CA 94103
Telephone: (415) 873-9199
Facsimile: (415) 952-9898
Email: telder@trelegal.com, knelson@trelegal.com

S. Tomiyo Stoner (CA Bar No. 289246)
Undaunted Law Firm, P.C.
600 California St., Floor 7
San Francisco, CA 94108
Telephone: (214) 415-7340
E-mail: tstoner@undauntedlaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

LISAMARIA MARTINEZ,

Plaintiff,

v.

COUNTY OF ALAMEDA,

Defendant.

Case No. 3:20-cv-06570-TSH

**DECLARATION OF KRISTOPHER
NELSON IN SUPPORT OF PLAINTIFF'S
PROPOSED EDITS TO COURT'S
REVISED PROPOSED FINAL JURY
INSTRUCTIONS**

Trial Date: March 25, 2024
Judge: Hon. Thomas S. Hixson

1 I, Kristopher Nelson, declare:

2 1. I am an attorney admitted to practice in California and a counsel of record for Plaintiff
3 Lisamaria Martinez. This declaration is based on my personal knowledge. I am competent to
4 testify on the matters stated and declare that these items are true and accurate to the best of my
5 knowledge and belief.

6 2. Attached as **Exhibit A** is true and correct redline showing Plaintiff's proposed edits to the
7 Court's Revised Proposed Final Jury Instructions, ECF No. 162.

8 3. This redline shows a proposed limiting instruction on page 16, a change to instruction 18
9 regarding monetary damages under the CDPA, additions to instruction 19 regarding Section
10 III35, and revisions to instruction 21 regarding an injunction.

11 4. This redline was also emailed to the Court and opposing counsel this morning, April 1,
12 2024, at 8:35 am.

13
14
15 I declare under penalty of perjury that the foregoing is true and correct.
16

17
18 Executed on: April 1, 2024

/s/ Kristopher Nelson
Kristopher Nelson